

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

JOSEPH CARAMADRE  
and RAYMOUR RADHAKRISHNAN

Defendants

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No. CR-11-186-S-DLM

**MOTION TO ENLARGE TIME TO FILE RESPONSE TO  
GOVERNMENT'S MOTION TO DISQUALIFY COUNSEL**

Now comes the defendant Joseph Caramadre, who respectfully moves this Honorable Court that the time within which he must file his response to the government's Motion to Disqualify Counsel be enlarged to July 10, 2012. As reason therefor, the defendant states that his lead counsel, Michael Lepizzera, is out of the United States during this holiday week and unavailable to participate in the preparation of the response. The Government does not object to the allowance of this Motion.

Pursuant to LR Crim. 12(f), the defendant agrees that the filing and disposition of this motion and the period of enlargement if allowed, would constitute excludable time as defined by 18 U.S.C. Section 3161(h)(1)(F), as the ends of justice outweigh the defendant's and the public's interest in a speedy trial.

Respectfully submitted,  
JOSEPH CARAMADRE  
By His Attorney,  
/s/Michael J. Lepizzera, Jr.  
Michael J. Lepizzera, Jr. (#4995)  
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Date: July 3, 2012

**CERTIFICATION**

I hereby certify that on the 3<sup>rd</sup> day of July, 2012, I filed this document through the ECF system with notice to all parties listed therein.

/s/ Scott K. DeMello